



LAW OFFICES OF
RILEY & RILEY

THE WASHINGTON HOUSE
100 High Street, Suite 302
Mount Holly, NJ 08060
(609) 914-0300
(609) 914-0323 Fax

Michael E. Riley
Tracy L. Riley

Rachel M. Conte

October 6, 2015

Honorable Noel L. Hillman, U.S.D.J.
Mitchell H. Cohen Courthouse
1 John F. Gerry Plaza
4th & Cooper Streets
Camden, New Jersey 08101

RECEIVED
OCT 6 - 2015
NOEL L. HILLMAN
U.S. DISTRICT JUDGE

RE: USA v. Lacerda, et al
Criminal No. 12-303 (NLH)

Dear Judge Hillman:

As I am sure the Court is well aware, the Government has added 61 more "victims" in anticipation of the upcoming sentencing for Ian Resnick.

My request is two-fold. Number 1, given the lateness of the Government's request, I would object to the government's use of this information. If the Court does not agree with my request, I would then respectfully request at least a three-week continuance so that the extra work that this additional material will generate can be completed. As the Court is aware, when we first attempted the original sentencing in June, the government was presenting material on 121 victims. Since that date, they have more than doubled their list of alleged victims. Further the Court is aware of the labor-intensive exercise of reviewing all these individual victims and preparing our sentencing arguments.

Thank you for your time and attention.

Respectfully submitted,

LAW OFFICES OF RILEY & RILEY

/s/ Michael E. Riley
Michael E. Riley, Esquire

MER/pg

cc: R. David Walk, Jr., A.U.S.A.
Sarah Brewer, Esquire